

REMARKS

After the advisory action, the undersigned requested and was granted an Interview by Examiner Rudy. The grant of the interview and the courtesies extended during the Interview, which was conducted on May 20, 2005, are gratefully acknowledged.

The following are Applicant's points as made in the Interview.

The status of this case is that a final action was issued on three grounds of rejection:

1. A rejection under 35 U.S.C. 112, paragraph two, based on the language in lines 3 and 4 of claim 15 and lines 9 and 10 of claim 15.

2. A rejection under 35 U.S.C. 112, paragraph two, based on the word "brought together" in claim 15.

3. A prior art rejection under 35 U.S.C. 103 based on Amos, U.S. Pat. No. 6,554,184, in view of Watanabe, U.S. Pat. No. 4,733,765, further in view of Richardson, U.S. Pat. No. 6,028,764.

The Examiner indicated that the first rejection of claim 15, could be resolved by placing a comma after the word, "notes" in line 3 and "coins" in line 9, and this has been proposed in the amendment. If the amendment is refused, Applicant's position is that the wording is sufficient in its present state and does not require amendment, except to reach agreement with the Examiner.

As to the second ground of rejection under 35 USC 112, second paragraph, it was also said in the Office action that the term "brought together" in claim 15 is not clear and that the term "coupled" was used in the specification.

In a spirit of compromise, Applicant has proposed to amend the language to simply recite "communicated" in place of "brought together" without any concession that such amendment was necessary, but solely to remove the issue from the examination, but prefers to retain brought together until such time as the Examiners agree to such an amendment.

It is believed that the rejection is not well grounded for the following reasons:

1. The words "brought together" and "coupled" have no word-for-word interrelationship as implied by the advisory action.

2. The specification and claim 15 makes clear that the devices communicate wirelessly and are not connected physically or through wired networks or servers like the cited prior art, as illustrated by the passages quoted below.

3. What is being "brought together" in claim 15 is the totals for coins and the totals for notes from the respective machines 12, 13. These totals are brought together for display and this is clear from the context of the remaining claim language, and from many passages in the specification as well as the drawings. This is not in any way rebutted by the word "coupled" in para. 0023.

4. On the other hand, the word "coupled" in para. 0023 should be read as "wirelessly coupled" or "communicatively coupled" as appears elsewhere in the specification.

Paragraph 0010, in relevant part, states:

Preferably, the cash handling devices are linked via RF communication devices employing one of the industry standard specifications, such as the Bluetooth specification, the IrDA specification, the Home RF specification or the SWAP protocol (an enhancement of the IEEE 802.11 standard). (Emphasis added.)

Paragraph 0014, in relevant part, states:

The automatic cash handling device 12, the remote peripheral devices 14, and remote cash handling devices 13 each includes a transceiver (not shown in Fig. 1) and an antenna 26 for wireless transmission and receipt of data and instructions from other devices. Both the cash handling devices 12, 13 and peripheral I/O devices 14 can preferably communicate in both directions with each other. (Emphasis added.)

Paragraph 0015, in relevant part, states:

Fig. 1 is a block diagram of a cash handling unit 12, such as a coin sorter, arranged in a wireless network with a peripheral cash handling unit 13, a note counter, and peripheral I/O devices 14, comprising a remote printer 18, a remote batch display 20 and a bar code scanner 22. (Emphasis added.)

Paragraph 0021 states in relevant part:

The cash handling device 12 can transmit data to a printer 18 or display 20 to provide batch information, error information, accounting totals, total number of coin or note denominations available, or other information. (Emphasis added.)

Paragraph 0022 states in relevant part:

As noted above, the cash handling machines 12 can also communicate with the cash handling machines 13 which provide coin sorting and counting, note sorting and counting, and note and coin dispensing functions. Data collected by the remote cash handling machines 13 is transmitted to the cash handling device 12, which can be programmed to monitor available cash levels, and provide cash settlement and batching functions for transactions. (Emphasis added.)

Paragraph 0023 states in relevant part:

The first cash handling device 12 is coupled to a second cash handling device 13 which provides the function of a note counter, and to three peripheral I/O devices 14. The peripheral I/O devices can be, for example, a printer 18 for printing transaction data and receipts, a batch display 20 for displaying accounting data by transaction, and a bar code scanner 22 for identifying each batch. The first cash handling device 12 counts and stores the value of the coins deposited, and requests a similar total of the value of notes counted from the second cash handling device 13. The results can be displayed directly on a display associated with the cash handling device 12, or transmitted to the batch display 20 or printer 18. (Emphasis supplied.)

Paragraph 0027, third sentence states in relevant part:

The master device is communicatively coupled to a plurality of slave units via an RF link emulating an RS-232 communication cable, constructed in accordance with the Bluetooth specification. (Double emphasis added.)

It is clear that the term "coupled" in paragraph 0023 means communicatively coupled through a wireless network as is clear from the rest of the specification.

It is also clear from paras. 0010, 0014, 0015, 0022, 0023 and 0027 that the note totals and coin totals are communicated to one or the other of the machines for display or to a remote display. The phrase "brought together through wireless communication ... and displayed" was simply for emphasis and is believed to be understandable by an ordinary person, and is certainly understandable to an engineer working in coin processing equipment.

Paragraph [0023] of the specification, in relevant part, states:

The automatic cash handling device 12 counts and stores the value of the coins deposited, and requests a similar total of the value of notes counted from the remote cash handling device 13. The results can be displayed directly on a display associated with the automatic cash handling device 12, or transmitted to the batch display 20 or printer 18. (Emphasis added.)

It is clear from this description in paragraph 0023 that the totals from both machines 12 and 13 can be communicated to a display associated with device 12 or to the display 20 for display.

The last Office Action should be withdrawn unless the prior art rejection can be maintained.

The third ground of rejection, the prior art rejection under 35 USC 103, is believed to be totally lacking in merit.

The rejection on the prior art is seen to be without basis notwithstanding the words questioned in the Office Action. In the claims, Applicant has provided general definitions for a note counter and a coin sorter/counter as

used in the financial and retail industries and incorporating a local wireless network for allowing them to work wirelessly to display totals collected at different locations with 100 meters distance.

Amos discloses two ATM's which communicate through signals Y,Y' over the Internet which uses wires and servers over long distances such as a portion of the United States. Applicant has carefully reviewed Amos and finds the despite a connecting line Z between the two machines, there is, in fact, no electrical communication along lines X and Z. X and Z are simply the communication of data to users at the respective ATM's or something else that is not described in the specification. The Amos Internet network is so substantially different than the invention of Applicant's claim 15 and the explanations provided in response to the Office actions as to make a rejection based on Amos, a non-substantial ground of rejection.

As to the addition of Watanabe, this shows a single ATM machine and is cumulative of Amos.

Richardson shows that a display can be detached from a computer and communicated with on a wireless basis. This is somewhat analogous to the physical portion of remote display 20. But, Richardson and the other art does not suggest communicating totals for notes and totals for coins from two coin processing devices (devices that perform functions beyond computing) to such a display as claimed in claim 15.

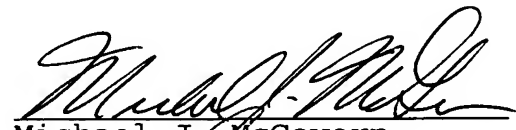
CONCLUSION

No fee is believed to be due, however if any fee is deemed to be due or to be credited, authorization is hereby given to use Deposit Acct. 17-0055.

In view of the Amendment and Remarks, reconsideration of the patent application is respectfully requested. After the amendment, claims 2-9 and 15-19 are now pending and a Notice of Allowance for these claims is earnestly solicited.

Respectfully submitted,

By:


Michael J. McGovern
Quarles & Brady LLP
411 East Wisconsin Avenue
Milwaukee, WI 53202-4497
(414) 277-5725
Attorney of Record